TECHNICAL NOTE

Job Name:	Land at Rainbow and Kirby Industrial Estate
Job No:	35321/4506
Note No:	001
Date:	26th September 2018
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Reviewed By:	Jill McGregor
Subject:	**Transport Note**

Introduction

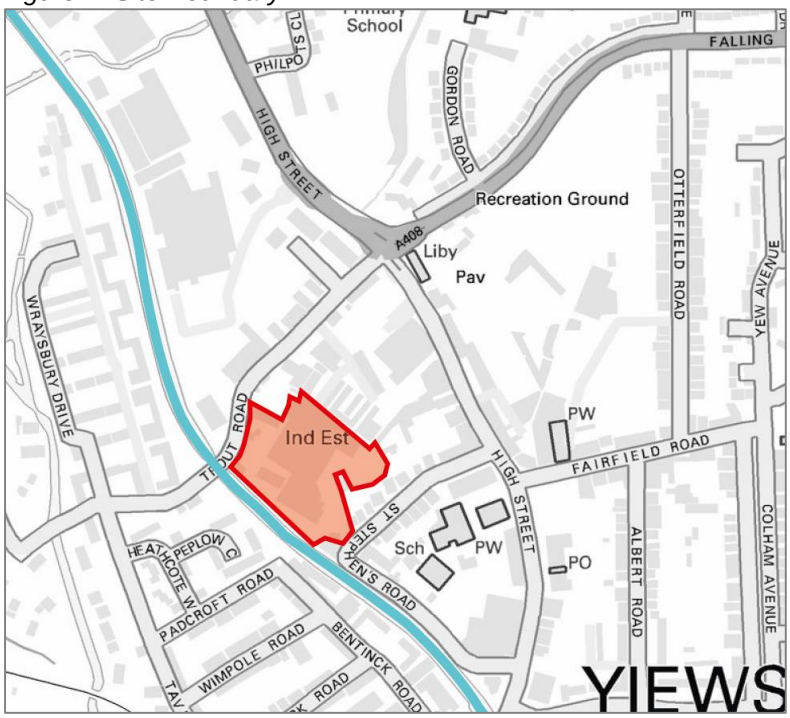
This Technical Note describes the transport context for land at the former Rainbow and Kirby Industrial Estate site on Trout Road, West Drayton, UB7 7XT and has been prepared in support of a planning application for a temporary car parking use on part of the site.

The application follows planning permission allowed on appeal in June 2017 for car parking for a temporary 12-month period which has now expired. The current application seeks to renew permission for a further 24-month period.

The site comprises part of the former Rainbow and Kirby Industrial site and is located in West Drayton in the London Borough of Hillingdon. The site is bound by Trout Road to the north; an industrial area to the east (part of the Kirby Industrial Estate currently still in use) and St Stephen's Road to the South. The Grand Union Canal lies directly west of the site, flowing in a north-south direction. The site boundary is illustrated as Figure 1.

This Note outlines the site's existing and proposed use, and how this relates to the transport context of the location. The planning background of the site is briefly described, and the relevant planning policies are also highlighted.

Figure 1: Site Boundary



Planning Background

Outline planning permission was granted at the Rainbow and Kirby Industrial Estates, Trout Road, Yiewsley on 23rd July 2014 for,

> '*Demolition of existing premises and erection of 99 residential units (C3), 50 unit extra care/dementia sheltered housing scheme (C3), 1,529.4sq.m light industrial floorspace comprising 17 business units (B1c) and 611. 30sq.m of restaurant/cafe (A3) floorspace, associated open space, car parking and landscaping (Outline Application)'* (LPA Ref: 38058/APP/2013/1756) ('The 2014 Permission').

Reserved Matters were submitted in April 2017 for '*Reserved Matters relating to Appearance and Landscaping of outline planning permission Ref: 38058/APP/2013/1756 dated 23-07-2014 for Demolition of existing premises and erection of 99 residential units (C3), 50 unit extra care/dementia sheltered housing scheme (C3), 1,529.4sq.m light industrial floorspace comprising 17 business units (B1c) and 611.30sq.m of restaurant/café (A3) floorspace, associated open space, car parking and landscaping' under* LPA Ref: 38058/APP/2017/1340. The Reserved Matters is still pending determination by LB Hillingdon.

An Enforcement Notice (ref: 3E04/VA/10341) was issued on 16/10/2016 on the application site for alleged breaching of planning control '*Without planning permission the use of the Land for car parking (Sui generis Use Class on Land at Rainbow Industrial Estate, Trout Road, West Drayton UB7 7XT*' ('the breach')).

An appeal against the Enforcement Notice was made in November 2016 and an appeal decision was issued on 8th June 2017 (PINS Refs: APP/R5510/C/16/3163200 and APP/R5510/C/16/3163365) which allowed use of the land for car parking for 12 months from the date of date decision i.e. from 8th June 2017 until 8th June 2018.

In considering highways impacts of the proposals the Inspector agreed that it was appropriate to make comparison to the permitted use in the 2014 outline planning permission. He went on to consider at paragraph 17, 18 and 19,

> *'Simple maths determines that the maximum level of daily movements is only 20 % of those permitted and the number of vehicular movements is noticeably less in the morning and evening peaks. Thus, even making some allowance for the activities that still operate from the buildings within the residual 0.9 ha, it is clear the level of vehicular movements is significantly less than that likely to be generated by the permitted use.*
>
> *18. In light of the above, whilst the Council might be technically correct to suggest that the unauthorised use has resulted in an increase in vehicular movements when compared to a nil use, following the demolition of the buildings, the level of increase appears to be well below that which the Council has permitted. In that context the Council has not explained why this level of increase would result in traffic congestion in the local area. The PBA Technical Note says junction capacity assessments conducted at 5 nearby junctions indicate that they operate efficiently and within practical capacity in all scenarios. The Council has provided no evidence to dispute this. So, whilst I acknowledge that the parking associated with the permitted scheme is designed to serve the mixed-use development, that does not alter my conclusion that the level of movements is less than that which the Council has previously found to be acceptable, such that it would not compromise the operation of the network.*
>
> *19. In the circumstances I find no conflict with UDP Policy AM2 because the level of traffic generation and impact on the highway network is less than that which the Council has already permitted. I also find compliance with UDP Policy AM7 because the level of traffic generation is acceptable, and the activity would not unacceptably increase the use of junctions at or near capacity, or prejudice the free flow of traffic or conditions of highway or pedestrian safety. With*

> *regard to the latter I note that the Council has put forward a suggested condition to deal with pedestrian visibility, which the Appellant in Appeal B has accepted.'* (PBA underlining)

The Inspector also considered at paragraph 20 that,

> *'With regard to LP Policies 6.1, 6.6 and 6.13, my starting point is that no conflict was alleged with these policies on the face of the notice. Paragraph 2.24 of the Council's statement appears to draw out the salient point to be that they seek to encourage development that is less reliant on access by private cars; I agree. However, I find no basis to conclude that these policies preclude the provision of car parking on a temporary basis as is now proposed. Pending completion of works to the Elizabeth Line and the consequential improvements to train services to Heathrow, these policies provide no basis to support a zero-tolerance approach to off-airport parking. Whilst the Council might not go that far, its statement does not clearly explain why it has found a conflict with LP Policies 6.1, 6.6 and 6.13 in the circumstances that prevail here*.' (PBA underlining)

The Inspector concluded on highways impact at paragraph 21 '*On the first main issue I conclude the use would not result in an unacceptable increase in vehicular movements or unacceptable traffic congestion in the area*.'

Relevant to this Technical Note condition 3 of the approval states:

> *3. The access from St Stephen's Road shall be provided with those parts of 2.4m x 2.4m pedestrian visibility splays which can be accommodated within the site in both directions and shall be maintained free of all obstacles to the visibility between heights of 0.6m and 2.0m above the level of the adjoining highway.'*

Existing Use

The site is currently leased to 'Drivefly' who use the site to operate airport related meet and greet valet car parking. Drivefly also provide hotel over flow parking.

The parking activity operates via two forms; customers can either drive to a Heathrow airport terminal where they are met by a parking valet who takes their car to a secure car park for the duration of their trip. On the customer's return to Heathrow their car is delivered by the valet to the terminal.

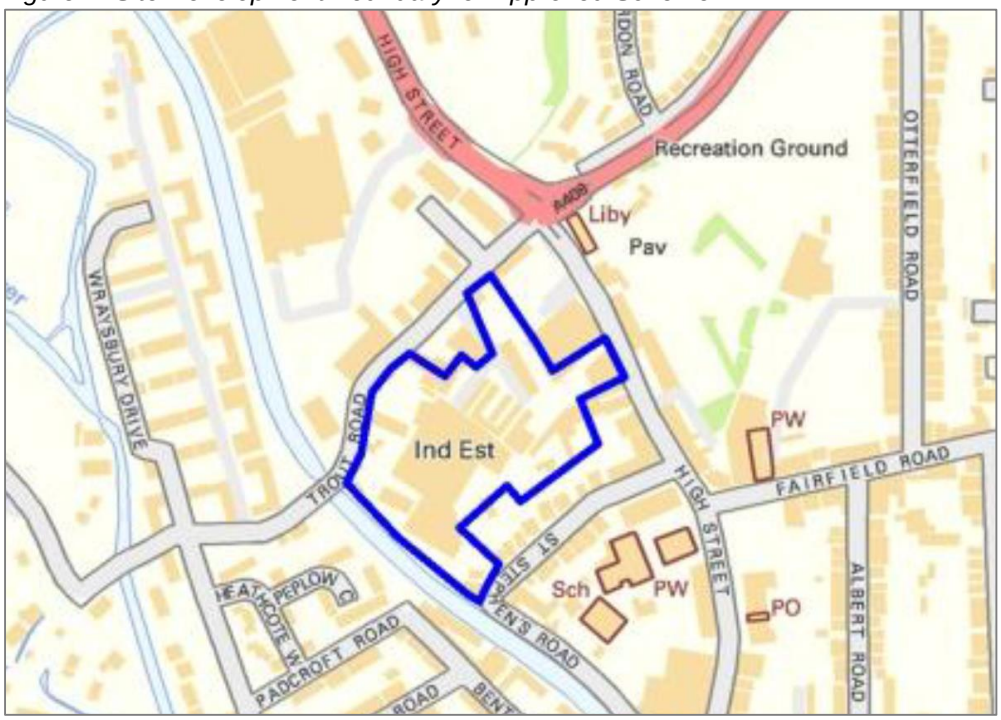
Drivefly provides a shuttlebus service to customers dropping off their own cars which operates on demand. Drivefly has advised that drop off by private individuals rather than Drivefly valet drivers in less than 20% of the total number of users.

Access to the site is now made from Trout Road instead of St Stephen's Road which was used at the time the Enforcement Notice was issued in order to comply with condition 3 of the appeal which required a 2.4m x 2.4m pedestrian visibility splay and an unobstructed access for vehicles. The St Stephen's Road access is now only used as an emergency exit.

The capacity of the site is approximately 500 car parking spaces and it is reported that there is a maximum of 70 (35 in and out) vehicular movements per day during peak holiday periods such as during the month of August and Bank Holidays. In an average period, the expected maximum vehicular movement per day is 20 (10 vehicles in and out of the site).

Drivefly advises that the movement of vehicles to and from the site typically takes place in the following time periods 10:00-12:00, 13:30-15:00 and 21:00-00:30, hence avoiding the traffic peak periods of 07:00 to 10:00 in the morning and 16:00 to 19:00 in the evening. The correspondence is included in Appendix A of the Technical Note submitted in August 2016 and has been confirmed as valid in 2018

Figure 2: Site Development Boundary for Approved Scheme



Source: Rainbow Park Transport Assessment, SKM Colin Buchanan, August 2013

Proposed Use

The planning application seeks to renew the temporary use of the site for car parking for a further 24 months. Proposed use will be no different from the car parking use described in the section above and as allowed on appeal in June 2017

Existing Transport Context and Conditions

The site lies approximately 5.5km north of Heathrow Airport; accessible within 20 minutes by car via the M4 or the M25. The M4 is approximately 2km south of the site, running in an east-west direction connecting to the A4 and into central London in the east with and the west to England and Wales. The M4 also provides access to the M25 at junction 15. A strategic location plan is illustrated in Figure 3.

Trout Road is a single carriageway road with a width of between 4.5 and 6 metres. This road forms the western arm to the signalised four arm junction between High Street (northern and southern arm) and Falling Lane (eastern arm). The junction has pedestrian crossing facilities across the Trout Road, Falling Lane and High Street (southern) arms.

The western end of Trout Road provides a bridge access over the Grand Union Canal, this structure is signalised at both ends as the bridge has a limited width which only allows a single lane of traffic to pass at any one time.

The High Street is a single carriageway road, and forms part of a Ticket and Meter No Waiting Zone from 8am to 6:30pm Monday to Saturday, with two public parking spaces, one disabled bay and a loading bay located between Trout Road and St Stephens Road.

The A408 Falling Lane is a single carriageway road, approximately 8 metres wide and runs from east to west.

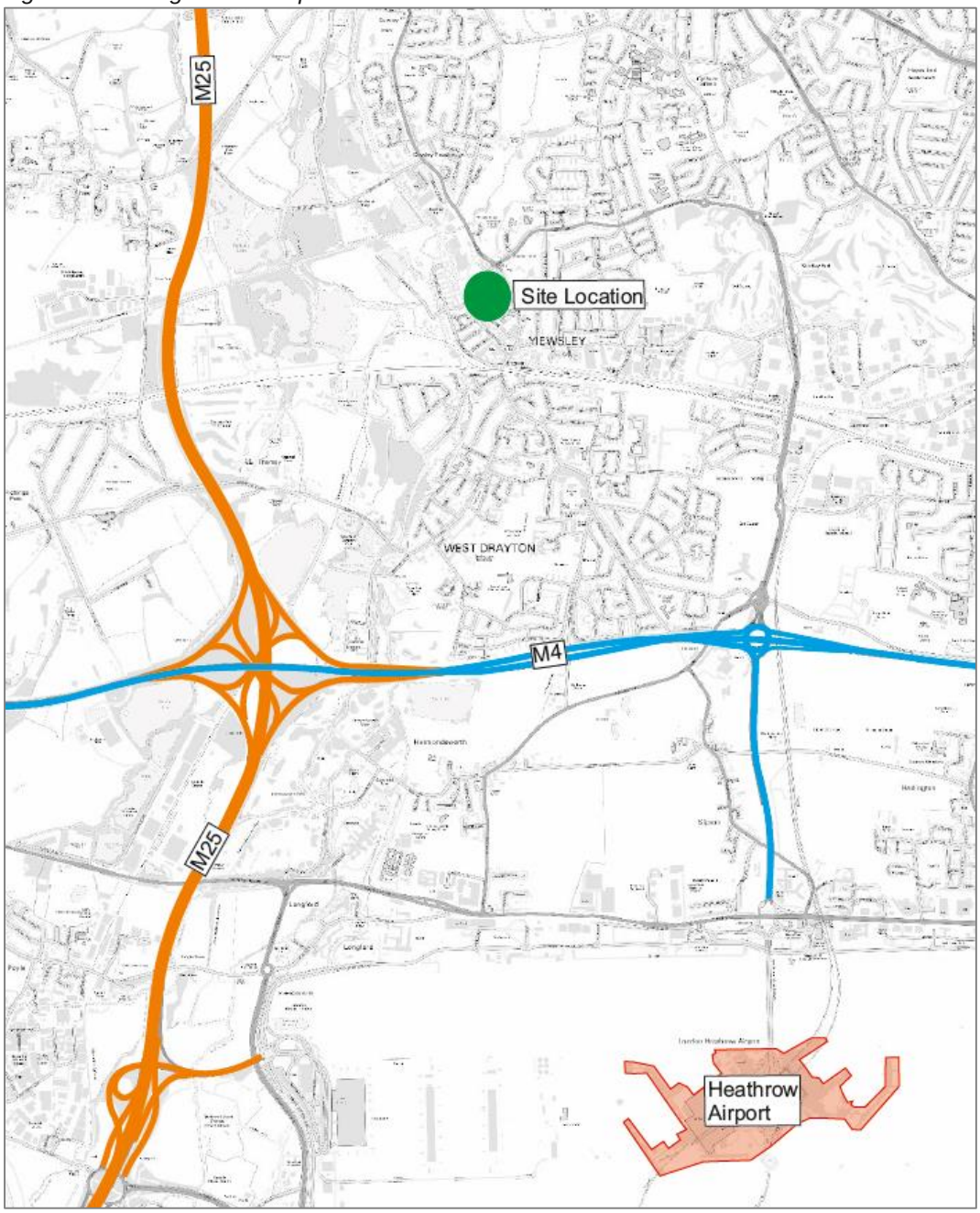
St Stephen's Road, now only used as emergency exit, is a single carriageway road approximately 4 metres wide. There is no right turn permitted from St Stephens's road at the junction with the High Street.

St Stephen's Road is located within a Controlled No Waiting Zone and operates from 09:00 to 18:00 Monday to Saturday.

There is controlled on-street parking on St Stephen's Road and Trout Road (between its junction with the High Street and crossing over the Grand Union Canal), which are provided for permit holders only. This area is part of the Y1 region of the local authority-controlled parking zone, and the operational hours are Monday to Saturday between 09:00 and 18:00.

The main vehicle access to the site is via Trout Road, approximately 50m northeast of the Grand Union Canal, which complies with condition 3 of the 2017 Appeal Decision. There is an alternative access on the southern corner via St Stephens Road for emergency access.

Figure 3: Strategic location plan



The Development Plan for the site comprises:

- London Plan (2016);
- Hillingdon's Local Plan: Part 1 -Strategic Policies (previously known as the Core Strategy) (2012); and
- Saved policies from the 2007 Saved Unitary Development Plan policies adopted as the Hillingdon Local Plan: Part Two (2007) (2012) (2015)

Other material considerations include the draft London Plan (2017), the emerging Hillingdon Local Plan: Part 2 - Site Allocations and Designations; Hillingdon Local Plan: Part 2 –Development Management Policies; Hillingdon Local Plan: Part 2 -Policies Map; the National Planning Policy Framework (NPPF) (2012) and the National Planning Practice Guide (NPPG) (2014).

National Policy

National Planning Policy Framework – Department for Communities and Local Government (July 2018)

The Government published the National Planning Policy Framework (NPPF) in July 2018. This forms a key part of their reforms to make the planning system less complex and more accessible, to protect the environment and to promote sustainable growth.

The NPPF provides guidance for local planning authorities in drawing up local plans that proposed development must accord with in order to be approved. A "presumption in favour of sustainable development" is at the core of the NPPF; development proposals that accord with the development plan will be approved without delay.

It also states that applications should only be prevented or refused on transport ground where the residual cumulative impacts of development are severe.

Regional Policy and Guidance

The London Plan (consolidated with alterations since 2011) (March 2016)

This document was published in March 2016 and is consolidated with all the alterations to the London Plan since 2011. The London Plan sets out the overarching policies and principles for developments in London until 2036. Transport was noted as having a fundamental role in addressing the objectives of the Plan.

Policy 6.3 states that development proposals should ensure that the impacts of the transport capacity and the transport network are fully assessed at a corridor and local level. Development should not adversely affect safety on the transport network.

The Draft New London Plan (2017)

This document was published in December 2017 and has been developed alongside the Mayor's other statutory strategies to ensure consistency with those strategies. The Draft New London Plan sets out the overarching policies and principles for developments in London until 2041 and when adopted will replace the existing London Plan (2016).

Local Policy and Guidance

The Unitary Development Plan (UDP) was Hillingdon's long-term development strategy, adopted in 1998, but is being replaced by the Local Plan in two parts.

Hillingdon's Local Plan: Part 1 -Strategic Policies (previously known as the Core Strategy) (2012);

The Local Plan Part 1 – Strategic Policies was adopted in November 2012 and sets out the overall level and broad locations of growth within the borough until 2026. It comprises a spatial vision, strategic objectives, a spatial strategy, core polices and a monitoring and implementation framework with clear objectives for achieving delivery. Relevant policies include:

- Policy T4: Heathrow Airport recognises the economic importance of the airport to the borough and supports sustainable growth within the Heathrow Opportunity Area by facilitating improvements to public transport and cycle links and enhancing the public transport interchange to encourage modal shift away from private cars.

Hillingdon Local Plan: Part 2 – Development Management Policies (Revised Propose Submission Version, October 2015)

- Policy DMT 1: Managing Transport Impacts states that developments must have no significant adverse transport or associated air quality and noise impacts on the local and wider network, particularly on the strategic road network.

- Policy DMAV 2: Heathrow Airport states that development proposals for airport related uses on sites outside the Heathrow Airport boundary will only be supported where there is a justification for the need for the development to locate there and, where relevant, an environmental impact and/or transport assessment and identification of mitigation measures.

- Table 1: Parking Standards – Specific requirements: 6. When designing car parks, vehicles must be able to enter and exit the site in forward gear. Surface car parks should be adequately screened and landscaped.

Transport Analysis

The 2014 outline planning permission and the Reserved Matters are yet to be implemented. The site would currently be vacant if it were not put to some temporary use and the car park use provides some security and economic benefits pending redevelopment of the wider Rainbow and Kirby Industrial Estate.

Details of the 2014 Permission with regards to the transport context can be found in SKM Colin Buchanan's *Rainbow Park Transport Assessment,* August 2013. The Transport Assessment concluded that the proposed development will not have any detrimental impact on the local highway network.

As stated in our previous Technical Note (August 2016) which was considered by the Inspector in the June 2017 Enforcement Notice Appeal, transport analysis was undertaken and is provided below for clarity. This document reports that the erstwhile use of this piece of land was industrial, and the trip generation for vehicular movement is summarised in Table 1. The vehicular trip generation for approved development in the 2014 proposal is presented in Table 2.

Table 1: Light Industrial Trip Generation – person trips (Existing use)

Mode	AM Peak 0800-0900		PM Peak 1700-1800		All Day 0700-2400	
	In	Out	In	Out	In	Out
Car Driver	85	30	23	74	529	622
HGV	3	1	1	3	20	23
Total Veh	88	31	24	77	549	645

Source: Rainbow Park Transport Assessment, SKM Colin Buchanan, August 2013

Table 2: Mixed Use Trip Generation – person trips (Future approved use)

Mode	AM Peak 0800-0900		PM Peak 1700-1800		All Day 0700-2400	
	In	Out	In	Out	In	Out
Car Driver	30	16	10	35	180	171

Source: Rainbow Park Transport Assessment, SKM Colin Buchanan, August 2013

As part of this Transport Assessment, junction capacity assessments were conducted at five junctions that surround the proposed development, these were the following:

- High Street/Trout Road/Falling Lane
- High Street/St. Stephen's Road (North)
- High Street/St. Stephen's Road (South)
- High Street/Tavistock Road
- Trout Road/Tavistock Road/Wraysbury Drive.

The scenarios for 2011 base, 2011 Base + Committed Development and 2011 Base + Committed Development + Proposed Development were undertaken. The results for all junctions indicate that they operate efficiently and within practical capacity for all scenarios tested.

The site subject of the application for car parking has the capacity to hold up to 500 cars, however the maximum existing vehicular movement reported is a total of 70 per day. This vehicular movement is significantly lower than the total AM peak or PM peak trips stated in Table 1. It is acknowledged that the movements shown in Table 1 apply to an area larger than the site in question. However, when comparing the daily movements, the car park use comprises only 6% and 20% of those reported in Table 1 and Table 2 respectively. This indicates that the vehicular movement associated with the car park is significantly less than the future approved use at this location.

Junction capacity assessments undertaken on the surrounding highway junctions indicate that they all operate efficiently and within practical capacity. Therefore, the temporary proposed use of the site is likely to have negligible impact on these junctions.

Conclusion

It is considered that the Inspector's assessment of highways impacts of the proposals in the June 2017 Enforcement Notice appeal remain valid as there is no change in the quantum and scale of car parking on the site and the wider Rainbow and Kirby Industrial Estate is still pending redevelopment.

The current proposals provide some improvement as access is now made from Trout Road instead of St Stephen's Road.

The June 2017 appeal decision confirmed:

- It is appropriate to make comparison to the 2014 permitted use.
- The level of vehicular movements is significantly less than that likely to be generated by the permitted use.
- Increased level of movements will not would not compromise the operation of the network.
- The level of traffic generation and impact on the highway network is less than which the Council has already permitted
- Existing Local Plan policies do not preclude the provision of cark parking on a temporary basis as is currently proposed.
- The proposal does not conflict with relevant Development Plan policies DP Policies.

It is concluded that the proposed car parking use would have negligible impact, if any, on the surrounding highway network and its users. The proposed levels of vehicular movements at the site would be significantly less than those likely to be generated by its existing approved use. The proposals will not therefore have an adverse transport impact on the surrounding area.